

From: [Nancy Fitz](#)
To: [Joanne Durand](#)
Subject: Re: Snyder tanks with no UN Marking Question
Date: 11/17/2011 09:34 AM

Hi Joanne,

It is possible that a Snyder 220 gallon tank with no UN symbol or DOT marking could be used under the refillable container regulations using the same DOT provision (49 CFR 173.241(c)) as the Monsanto tanks because it is a "non-DOT Specification portable tank suitable for transport of liquids." However, the tank would still need to:

- Be durably marked with a serial number or other identifying code,
- Have a tamper-evident device or one-way valve on each opening that is not a vent, and
- (Most importantly) be included on the registrant's description of acceptable containers.

So if the Snyder 220 gallon tanks comply with the first two bullets and the registrant includes them on the description of acceptable containers for a specific pesticide, the Snyder 220's could be used for that pesticide. However, if the registrant's description of acceptable containers requires that the refiller use containers that meet the DOT Packing Group III requirements, the Snyder 220's could not be used.

Talk with you this afternoon!

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Pesticide container & containment web site:
<http://www.epa.gov/pesticides/regulating/containers.htm>

▼ "Joanne Durand" ---11/15/2011 11:09:52 AM---Snyder 220's with no UN #'s...are they still ok to use based on the Monsanto exemptions.

From: "Joanne Durand" <joanne@aginfodata.com>
To: Nancy Fitz/DC/USEPA/US@EPA
Date: 11/15/2011 11:09 AM
Subject: Snyder tanks with no UN Marking Question

Snyder 220's with no UN #'s...are they still ok to use based on the Monsanto exemptions.

Joanne Durand

Resource Advocate

R360 Division

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and Tamper Evident Seals*

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